

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION**

MAR'BELLA SANDOVAL, individually and
on behalf of all others similarly situated,

Plaintiff,

v.

SERCO, INC.,

Defendant.

Case No. 4:18-cv-01562-JAR

DECLARATION OF JADE M. GILSTRAP

I, Jade M. Gilstrap, pursuant to 28 U.S.C. § 1746, state as follows:

1. I have personal knowledge of the facts set forth in this Declaration.
2. I submit this Declaration in support of Defendant's Motion for Denial of Plaintiff's Motion for Court-Facilitated Notice, Accounting of Plaintiff's Communications with Putative Class Members, and Sanctions, filed contemporaneously herewith.
3. On February 25, 2019, Serco and its counsel became aware that Opt-In Plaintiff Terra Hudson had posted information regarding the above captioned lawsuit on her Facebook page.
4. On February 28, 2019, I accessed Ms. Hudson's publicly available Facebook page (located at: <http://www.facebook.com/terra.hudson.37>) by typing her name in the search bar on the Facebook website and clicking the first hyperlinked name yielded by the search.
5. Upon accessing Ms. Hudson's Facebook page, I observed a message dated February 20, 2019, which appeared to be a copied and pasted email from Carter Hastings, an attorney at Anderson Alexander, PLLC. A screenshot of the Facebook post appears to the right.
6. As depicted in the screenshot, Ms. Hudson tagged Christina Marie Gamboa and 39 other individuals to her post. Upon clicking the hyperlink labeled "39 others," I was able to view the names of the 39 other individuals who were tagged. Screenshots of the names that were displayed appear below.



Terra Hudson is with Christina Marie Gamboa and 39 others.

Feb 20 at 7:05 PM · 🌐

SERCO OR EX-SERCO PEEPS: (got this in my email) share with others you may know.

We have added an update to our case against Serco. You can find the update here, <https://a2xlaw.com/active-cases/serco/>

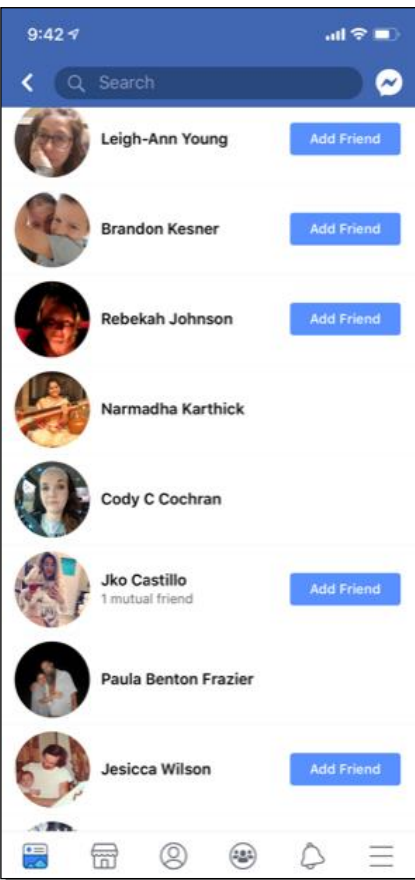
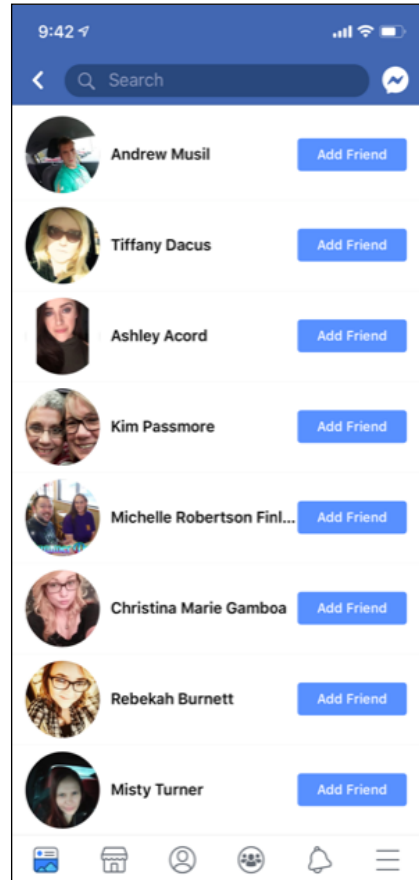
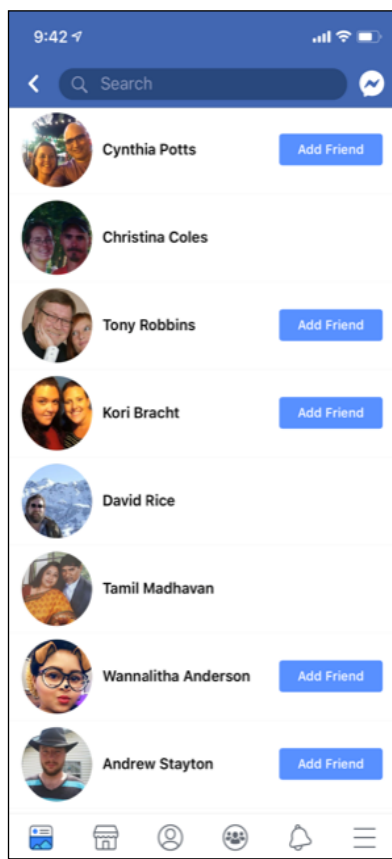
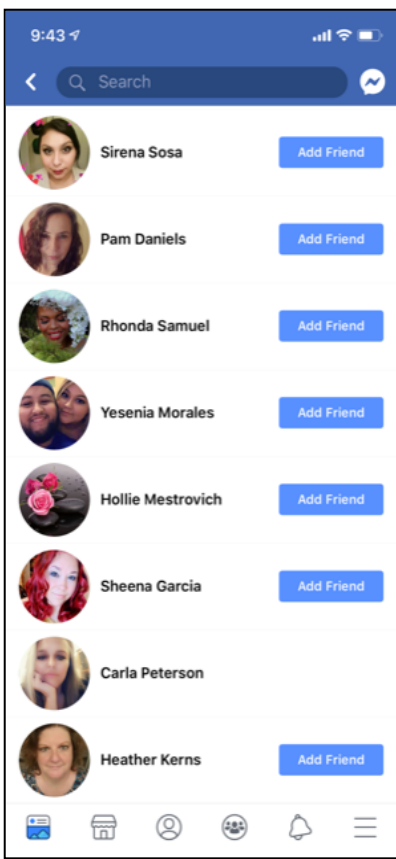
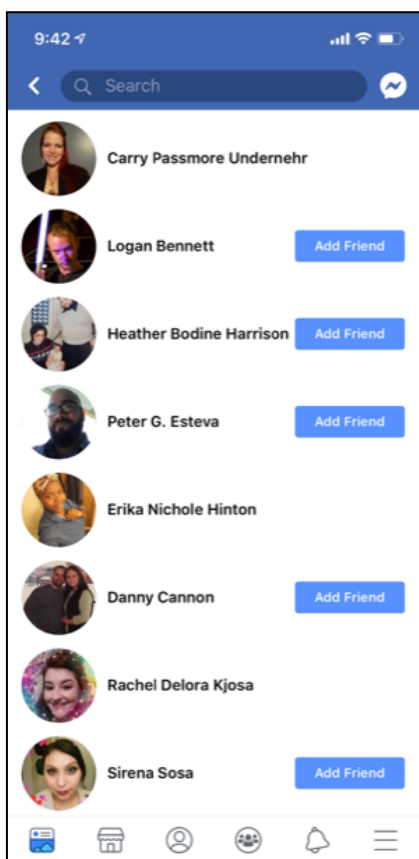
Please share this website with anyone you know who worked for Serco so they can complete the consent form linked at the bottom to join the case. Every person who joins makes the case stronger and pushes Serco to settle more quickly before more people join. Additionally, please take a moment to look at our other active cases. Oftentimes, wage violations like the one in this case are shared across the industry and you may find that you are eligible for another case we have against another employer you worked for.

If you have already signed a consent form to join this case you do not need to complete another one. If your address, phone number, or other contact details have changed please email those changes to Team@a2xlaw.com with the subject line CHANGE OF CONTACT INFORMATION.

Best Regards,

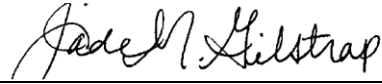
Carter Hastings

Anderson Alexander, PLLC
819 North Upper Broadway
Corpus Christi, TX 78401
361.452.1279 (O)
361.452.1284 (F)



I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge, information, and belief.

Executed on March 13, 2019

A handwritten signature in black ink, reading "Jade M. Gilstrap". The signature is written in a cursive, flowing style. The first name "Jade" is written with a large, stylized "J". The middle initial "M." is written in a smaller, more compact cursive. The last name "Gilstrap" is written with a large "G" and a trailing flourish.

Jade M. Gilstrap